



November 15, 2012

Anne Littlejohn
Central Valley Regional Water Board
11020 Sun Center Drive, Ste. 200
Rancho Cordova, CA 95670

Subject: Evaluation of the Municipal and Domestic Supply Beneficial Use in Agriculturally Dominated Water Bodies

Dear Ms. Littlejohn:

California Urban Water Agencies (CUWA) appreciates the opportunity to provide comments on the scope of the California Environmental Quality Act (CEQA) evaluation of the proposed process to develop a framework to evaluate the municipal and domestic supply beneficial use (MUN) in agriculturally dominated water bodies. CUWA's primary interest in this process is in protecting the MUN beneficial use and preventing degradation of water quality in downstream water bodies, and we believe that this can be done while still providing regulatory relief where discharges into constructed agricultural drains do not threaten water quality for downstream MUN diverters.

In order to appropriately de-designate the MUN beneficial use in constructed agricultural drains, it is important to develop a rigorous and technically sound framework to evaluate the implications of de-designating water bodies for the MUN beneficial use. CUWA agencies suggest that the MUN use should be maintained, and all associated water quality objectives should be achieved in water bodies that are downstream of constructed agricultural drains. Any consideration of MUN de-designation on constructed agricultural drains should account for downstream uses. The framework should ensure that downstream degradation in water quality does not occur as a result of this process.

CUWA has reviewed the Information Document and we believe that the Central Valley Regional Water Board staff has identified a broad range of alternatives to consider in the CEQA evaluation. We look forward to continuing to participate in this process.

Sincerely,

Cindy Paulson, Ph. D.
Executive Director

201 N. Civic Dr., Suite 115, Walnut Creek, CA 94596 925.210.2525 FAX 925.937.9026

Alameda County Water District

Santa Clara Valley Water District

Zone 7 Water Agency

San Diego County Water Authority

City of San Diego Public Utilities Department

Contra Costa Water District

San Francisco Public Utilities Commission

East Bay Municipal Utility District

Metropolitan Water District of Southern California

Los Angeles Department of Water & Power